

IN THE UNITED STATES BANKRUPTCY COURT  
OF THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: : Case No. 4-15-02169  
LESLIE J. COSTA and HECTOR J. :  
COSTA, JR., :  
Debtors :  
NATIONSTAR MORTGAGE, LLC, : Chapter 13  
Movant :  
VS. :  
LESLIE J. COSTA and HECTOR J. :  
COSTA, JR., and CHARLES J. :  
DeHART, III, ESQUIRE, TRUSTEE, :  
Respondents :

ANSWER ON BEHALF OF DEBTORS  
LESLIE J. COSTA AND HECTOR J., COSTA, JR.,  
TO MOTION OF NATIONSTAR MORTGAGE, LLC,  
FOR RELIEF FROM AUTOMATIC STAY

AND NOW COME, Leslie J. Costa and Hector J. Costa, Jr., Debtors herein ("the Costas"), by their attorneys, Stover, McGlaughlin, Gerace, Weyandt & McCormick, P.C., and respectfully respond as follows:

1. Admitted.

2. Admitted.

3. Admitted.

4. Denied as stated. It is admitted (a) that Movant is the holder of a mortgage which was recorded and assigned as stated and (b) that there are attachments to the Motion in support of the motion and the right to seek a lift of the automatic stay. Hector J. Costa, Jr., was laid off in October 2018 and has returned to work in April 2019. The Costas intend to become current before the hearing on May 17, 2019.

5. Admitted.

6. Denied as stated. The Costas made a payment in the amount of \$861.01 on or about March 14, 2019, and intend make four additional payments to become current on or before May 17, 2019.

7. Denied as stated. The Costas intend make four additional payments to become current on or before May 17, 2019.

8. Denied. The Costas believe and therefore respond that their home is worth \$156,000 and that Movant's lien is protected by both an equity cushion and monthly payments, which will become current on or before May 17, 2019.

9. Denied as stated. It is admitted that the motion and averments do not constitute a waiver of Movant's right to file a Notice of Post-petition Mortgage Fees, Expenses, and Charges pursuant to the Federal Rules of Bankruptcy Procedure.

WHEREFORE, Leslie J. Costa and Hector J. Costa, Jr., Debtors herein, respectfully request that this Honorable Court deny the relief requested in the Motion for Relief from the Automatic Stay filed by Nationstar Mortgage, LLC, and for such other and further relief as is equitable and just.

Respectfully submitted,

STOVER, McGLAUGHLIN, GERACE,  
WEYANDT & McCORMICK, P.C.

BY: /s/ Don Michael Hahn  
Don Michael Hahn, Esquire  
122 East High Street  
Bellefonte, PA 16823  
(814) 355-8235  
Attorney for Debtors

I, Leslie J. Costa, Debtor herein, declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Dated: 4/13/19

/s/ Leslie J. Costa  
Leslie J. Costa

I, Hector J. Costa, Jr., Debtor herein, declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Dated: 4/13/19

/s/ Hector J. Costa, Jr.  
Hector J. Costa, Jr.

CERTIFICATE OF SERVICE

I hereby certify that I am this day serving the foregoing documents upon the person(s) and in the manner indicated below:

Service by ECF Filing Notice as Follows:

James C. Warmbrodt, Esquire  
Attorney for Movant

Charles J. DeHart, III, Esquire  
Chapter 13 Trustee

DATED this 16<sup>th</sup> day of April, A.D., 2019.

/s/ Donald M. Hahn